

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
MAY 20 2020
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIAN FERGUSON,

Defendant.

) INDICTMENT
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CASE NO.

JUDGE OLIVER

5:20 CR 262

Title 18, United States Code,
Sections 1201(a)(2), (a)(5) and
(d)

GENERAL ALLEGATIONS

1. At all times material to this Indictment, the National Parks Service, Department of the Interior was engaged in the maintenance, upkeep, care, and security of the National Parks System, including the Cuyahoga Valley National Park, (CVNP), in a manner affecting interstate commerce and as part of an industry which affects interstate commerce.

2. At all times material to this Indictment, the CVNP was created as a National Recreation Area in 1974 by act of Congress and in 2000 Congress enacted legislation designating the park a National Park. The CVNP employs over 100 permanent and temporary federal employees. In 2018, there were over 2 million visitors hailing from Ohio and states outside of Ohio to the CVNP. The Park is regulated by Title 36 of the Code of Federal Regulations, and Titles 18, 21, and 54 of the United States Code.

3. At all times material to this Indictment contained within the boundaries of the CVNP is the Cuyahoga River, which is under the direction of the Buffalo, New York, office of the Army Corps of Engineers, as is the Ohio and Erie Canal Towpath, a Congressionally recognized National Historic Area.

4. At all times material to this Indictment, the safety of visitors and property traveling to and through the CVNP was ensured by Park Rangers of the National Park Service, who are federal officers and employees as defined in Title 18, United States Code, Section 1114, and who carry firearms, body armor and other personal property in the performance of their official duties.

COUNT 1

(Attempted Kidnapping, 18 U.S.C. §§ 1201(a)(2) and (d))

The Grand Jury charges:

5. Paragraphs 1 through 4 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

6. From on or about March 21, 2020 to on or about May 8, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant CHRISTIAN FERGUSON did attempt to unlawfully seize, confine, inveigle, kidnap and abduct Federal officers of the National Park Service Park Rangers, said attempted seizure, confinement, inveigling, kidnapping and abduction having occurred within the special maritime and territorial jurisdiction of the United States, to wit: the Cuyahoga Valley National Park, in violation of Title 18, United States Code, Sections 1201(a)(2) and (d)).

COUNT 2

(Attempted Kidnapping, 18 U.S.C. §§ 1201(a)(5) and (d))

The Grand Jury further charges:

7. Paragraphs 1 through 4 of the Indictment are re-alleged and incorporated by reference as if fully set forth herein.

8. From on or about March 21, 2020 to on or about May 8, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant CHRISTIAN FERGUSON did

attempt to unlawfully seize, confine, inveigle, kidnap and abduct Federal officers of the National Park Service Park Rangers, while the officers were engaged in, and on account of, the performance of their official duties, in violation of Title 18, United States Code, Sections 1201(a)(5) and (d)).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.